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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8  
999 18<sup>TH</sup> STREET - SUITE 500  
DENVER, CO 80202-2466  
<http://www.epa.gov/region08>

SEP 29 1999

Ref: 8EPR-F

Jessie M. Roberson, Manager  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Hwy 93, Unit A  
Golden, Colorado 80403-8200

Dear Ms. Roberson:

In your letter dated September 17, 1999, you requested a modification to the NPDES Federal Facility Compliance Agreement, FFCA-CWA-90-1. We are in agreement that the Compliance Agreement should be modified. In addition to changes requested in your letter regarding total residual chlorine analyses and nitrate levels, it will be beneficial to clarify certain provisions of the Compliance Agreement that have been completed. In modifying the Compliance Agreement, we propose to clarify changes that were addressed in a letter exchange begun on October 31, 1995, with a letter from James K. Hartman, and concluded by a response on March 6, 1996 from Bill Yellowtail.

With regard to the current solar ponds plume issue involving nitrate levels and your request regarding total residual chlorine analyses, we propose the following modifications:

## I. EFFLUENT LIMITATIONS

A. Effective January 1, 1999, the Outfall 002 (Pond A-3) Effluent Limitations for nitrate and nitrite shall be 100 mg/l and 4.5 mg/l, respectively, to be consistent with the temporary modifications for Big Dry Creek Segment 5 established in 1998.

B. Not later than January 1, 2000 the Outfall 002 Effluent Limitations shall apply at point GS-13, a location downstream of the infiltration gallery for the solar ponds interim measure and upstream of the Pond A-1 bypass. This is the same point identified as the performance monitoring location on page 48 of the Final Solar Ponds Plume Decision Document (RF/RMRS-98-286.UN) dated June 1999.

C. Effective September 30, 1999, Total Residual Chlorine (TRC) Effluent Limitations shall no longer apply to Outfall 001, reflecting the discontinuation of chlorine disinfection at the STP.

OPTIONAL FORM 92 (7-99)

## FAX TRANSMITTAL

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|---------------------------------|----------------------------|
| To<br><i>loc Legars</i>         | From<br><i>Tim Rehder</i>  |
| Dept/Agency                     | Phone #<br><i>312-6293</i> |
| Fax #<br><i>966-2495</i>        | Fax #<br><i>312-6897</i>   |
| NSN 7540 01-217-7000            | 5010-101                   |
| GENERAL SERVICES ADMINISTRATION |                            |

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## II. EFFLUENT MONITORING

A. Not later than January 1, 2000, nitrate and nitrite shall be monitored at GS-13 by the analysis of composite samples obtained not less than twice per calendar month.

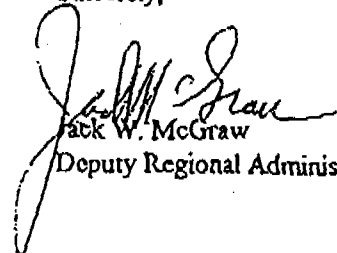
B. Effective September 30, 1999, TRC monitoring at Outfall 001 may be discontinued.

We anticipate being able to finalize modifications to the Compliance Agreement during the month of October. Toward this end, Lorraine Ross, our attorney for Rocky Flats will contact Michael McCann to begin negotiations. Ms. Ross will be out of the office the week of October 4, but will contact Mr. McCann promptly upon her return to the office on October 12.

This agreement to modify the Compliance Agreement eliminates any barriers to the immediate operation, in compliance with the terms noted above, of the passive groundwater system for the solar ponds plume. We commend you for your efforts in completing the installation of this system. We view it as an important step in the environmental restoration of Rocky Flats.

If you have any questions regarding this matter, please contact me at (303) 312-6308.

Sincerely,

  
Jack W. McGraw  
Deputy Regional Administrator

cc: Mike McCann DOE-RFFO  
Joe Legare DOE-RFFO  
Steve Gunderson CDPHE  
Dave Shelton Kaiser Hill